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August 24, 2021

*Document Electronically Filed*

Hon. Ona T. Wang  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Arroyo v. Commissioner of Social Security  
Civil Action No: 1:20-cv-09364-OTW

Dear Judge Wang:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to serve her portion of the Joint Stipulation, which is currently due on August 30, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her portion of the Joint Statement.

Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's portion of the Joint Stipulation.

If this request is granted, Plaintiff's portion of the Joint Stipulation will be due to Defendant on **October 29, 2021**. Subsequently, in accordance with the pattern of the Scheduling Order (Dkt.18), the Commissioner's portion of the Joint Stipulation would then be due to Plaintiff **November 29, 2021**. Plaintiff's incorporation of any reply into the Joint Stipulation would then be due **December 13, 2021**, with Defendant reviewing and filing the Joint Stipulation **December 16, 2021**.

Thank you for your consideration.

Respectfully submitted,  
/s/ Howard D. Olinsky  
Howard D. Olinsky, Esq.  
Bar Code H06529  
Counsel for Plaintiff

CC [via ECF]: Maria Pia Fragassi Santangelo (Counsel for Defendant)

**SO ORDERED.**

Dated: August 27, 2021  
New York, NY

  
**Honorable Ona T. Wang**  
U.S. Magistrate Judge

